



State of Arizona
Naturopathic Physicians
Board of Medical Examiners

"Protecting the Public's Health"

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Notice to all Naturopathic Physicians
Re: Live Blood Cell (Dark Field) Analysis

The Federal Department of Health and Human Services has informed this Board that some of our doctors are engaging in Live Blood Cell Analysis (also known as Dark Field Analysis) without complying with the requirements of the Clinical Laboratory Improvement Amendments of 1988 (CLIA). This is not only a violation of federal law but a violation of Arizona Revised Statutes, Title 32 -1501 (30),(s) and possibly ARS 32-1501 (30)(dd). If a naturopathic physician is found to be in violation, it could result in Board actions against the physician's license including revocation and a \$10,000 fine.

Live Blood Cell Analysis is considered experimental and requires experimental protocols be followed including an Institutional Review Board and a CLIA High Complexity Testing Certificate. It is our understanding that CLIA will not issue a High Complexity Certificate to a doctor's office.